


FILED

JAN 24 2019

UNITED STATES DISTRICT COURT

for the

Eastern District of California

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY  DEPUTY CLERK

United States of America

v.

Kevin Savangsy

Case No.

2:19-MJ-0022 EFB


Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 24, 2018-January 24, 2019 in the county of Sacramento in the
Eastern District of California, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 922(a)(1)(A)
26 U.S.C. § 5861(d)Unlawful Dealing and Manufacturing in Firearms
Unlawful Possession of an Unregistered Firearm

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF ATF SPECIAL AGENT DANIEL YUN

☒ Continued on the attached sheet.
Complainant's signature

Daniel Yun, ATF Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/24/2019
Judge's signatureCity and state: Sacramento, California

United States Magistrate Judge Edmund F. Brennan

Printed name and title

Affidavit in Support of a Criminal Complaint

I, Daniel Yun, being duly sworn, hereby depose and state:

Purpose of Affidavit

1. This affidavit is submitted in support of a criminal complaint for Kevin Savangsy for violation of 18 U.S.C. § 922(a)(1)(A), unlawful dealing and manufacturing firearms, and 26 U.S.C. § 5861(d), possession of an unregistered firearm.

Agent Background

2. I am a Special Agent ("SA") with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"). I have been an ATF Special Agent since September 2012. Prior to working for ATF, I was employed as a Captain in the United States Army for approximately nine years. I have received training in federal firearms and narcotics laws and regulations at the ATF National Academy and Federal Law Enforcement Criminal Investigator Training Program. I have investigated numerous cases involving federal firearms violations, involving unlawful sales, possession, manufacturing, and transportation of firearms. I have acquired knowledge and experience as to firearms and ammunition and the interstate nexus of firearms and ammunition, due to investigations, research, records, familiarity, conferring with other experts, training, teaching, and certifications. I have participated in a variety of different aspects of those investigations, including surveillance, undercover operations to conduct controlled purchases of firearms and/or controlled substances, and the execution of search and arrest warrants. I have been the affiant on affidavits for search warrants relating to firearms, narcotics, and gang-related offenses.

3. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

4. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This Affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

Federal Laws Presently Implicated in the Investigation

5. Since January 2018, undercover law enforcement officers have conducted controlled purchases of approximately thirty, both commercially and unlawfully, manufactured firearms. All but seven firearms were modified to function as a fully automatic machine gun.

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January 24, 2018 - UC Purchase from SAVANGSY

6. On January 24, 2018, ATF Confidential Informant (“CI”) 10988 advised Task Force Officer (“TFO”) Ryan Oliver that an individual the CI knew as Kevin SAVANGSY had offered to sell the CI two handguns for \$1,700.00. TFO Oliver advised the CI to contact SAVANGSY and coordinate a firearms transaction for that day. ATF CI 15561 accompanied CI 10988 for this undercover transaction.

7. At approximately 4:58 PM, CI 15561 and CI 10988 arrived in the area of 2813 Grove Avenue, Sacramento, California, 95815, where the CIs met with SAVANGSY. SAVANGSY arrived in a black Audi bearing California license plate 6KMB860. SAVANGSY got into the rear of the undercover vehicle used by the CIs and produced both firearms that would be sold to the CI. CI 10988 paid SAVANGSY with \$1,700.00 in pre-recorded law enforcement funds for the firearms. During the transaction with CI 10988 and CI 15561, SAVANGSY stated that he had other firearms that he may be willing to sell.

January 31, 2018 - UC Purchase from SAVANGSY

8. At approximately 1:52 PM, and ATF undercover agent (“ATF UC”) and CI 10988 arrived at 2813 Grove Avenue, Sacramento. The ATF UC observed SAVANGSY standing by a black Audi A4 sedan (California license plate: 6KMB860). The ATF UC then observed SAVANGSY open the trunk of his vehicle and removed an orange bag from it and put in the rear driver side door. Throughout this case, the ATF UC was using a concealed body-worn camera during meetings with SAVANGSY.



9. After greeting SAVANGSY, both the CI and the ATF UC inspected the firearm in the rear driver side seat of SAVANGSY’s vehicle.



10. The ATF UC returned to the UC vehicle to retrieve the funds for the firearm. The ATF UC then counted and paid \$2,300.00 for the AK type pistol. The ATF UC also gave an extra \$100.00 for the revolver SAVANGSY had originally wanted to sell. The ATF UC observed SAVANGSY open the trunk of his vehicle. SAVANGSY opened a Vans shoe box containing the revolver. The ATF UC asked SAVANGSY what other firearms he could get and SAVANGSY replied to the UC with "I can get hella shit."



11. For this transaction, the UC purchased the following:
- a. Smith & Wesson revolver (SN: 408359)
 - b. Centurty Arms RAS47 pistol (SN: RAS47P003188)



October 5, 2018 - UC Purchase from SAVANGSY

12. At approximately 12:16 p.m. on October 5, 2018, the ATF UC and CI 10988 arrived at SAVANGSY's residence located at 358 Lindley Drive, Sacramento (the Target Residence). The ATF UC observed SAVANGSY in the doorway of the garage of the residence. The CI exited the UC vehicle and greeted SAVANGSY. The ATF UC observed both the CI and SAVANGSY enter the side garage door of the residence. The ATF UC could hear a firearm being "racked" (referring to the action of manipulating the firearm's slide in order to clear the chamber).



13. The CI and SAVANGSY exited the residence to give the ATF UC the firearm. The ATF UC greeted SAVANGSY. The ATF UC opened the trunk of the vehicle and inspected the Glock pistol. The ATF UC counted and paid SAVANGSY \$700.00 in pre-recorded funds for the Glock pistol.



14. For this transaction, the UC purchased the following:

- a. One (1) Glock 43 (SN: BAXU181)
- b. Six (6) rounds of 9mm ammunition
- c. One (1) Glock 43, 9mm magazine



October 9, 2018 - UC Purchase from SAVANGSY

15. At approximately 6:15 PM, the ATF UC arrived at SAVANGSY's residence. The ATF UC observed the garage of the residence open and SAVANGSY inside it. The ATF UC also observed two white vehicles in the driveway; one white Honda Accord bearing California plate 7TAH575 and one white Lexus GS 350 bearing California plate 7KKJ848. The ATF UC exited the UC vehicle and walked towards the garage of SAVANGSY's residence. The ATF UC asked if the Lexus belonged to SAVANGSY and he replied in the affirmative.

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16. The ATF UC observed a backpack in front of SAVANGSY which he was manipulating. Inside the backpack contained the Glock 26 firearm that SAVANGSY was selling to the ATF UC. The ATF UC inspected the Glock 26 and the Glock auto sear that was already installed on the pistol.

17. At approximately 6:16 PM, SAVANGSY placed a phone call to an unknown individual who was in possession of the magazines and the case to the Glock pistol. The ATF UC counted and paid SAVANGSY \$1,700.00 in pre-recorded funds for the Glock 26. SAVANGSY asked the ATF UC if there was any particular types of firearms that the UC preferred. SAVANGSY indicated to the ATF UC the firearms were sourced from Reno, NV, however, later told the ATF UC that he was not the individual actually picking up the firearms.

18. The ATF UC placed the Glock pistol in the UC vehicle. SAVANGSY asked if the ATF UC wanted to purchase “packs” (referring to marijuana). SAVANGSY then went into the residence to retrieve the marijuana. SAVANGSY told the ATF UC he was shipping his marijuana to Georgia, Tennessee, and Florida.



19. At approximately 6:26 PM, the ATF UC observed a maroon Audi A4 arrive at SAVANGSY’s residence. The ATF UC observed the driver go to the trunk of the Audi and removed a black Glock pistol box. SAVANGSY asked the individual about the large capacity magazine and the individual told SAVANGSY he had forgotten about it. The ATF UC observed the individual remove a Glock from around his waist and asked SAVANGSY to hold it. SAVANGSY told the ATF UC it was a Glock 42, 380 caliber.



20. SAVANGSY asked if the ATF UC wanted to purchase a large capacity magazine for the previously purchased Glock 43. The ATF UC agreed and SAVANGSY said it would cost \$40. The ATF UC paid SAVANGSY \$100 and SAVANGSY gave, in return, \$60 in change.

21. At approximately 6:32 PM, the unidentified individual driving the maroon Audi returned with two large capacity magazines. For this transaction, the UC purchased the following:

- a. One (1) Glock 26 (SN: BDWG904) semi-automatic pistol with
- b. One (1) Glock selector switch style auto sear (SN: None)
- c. Fifteen (15) rounds of 9 mm ammunition
- d. Two (2) Glock magazines
- e. One (1) Glock case containing additional accessories
- f. One (1) Glock 43 large capacity magazine



October 10, 2018 - UC Purchase from SAVANGSY

22. At approximately 5:19 PM, the ATF UC arrived SAVANGSY's residence. The ATF UC observed SAVANGSY in the driveway of the residence. The ATF UC and SAVANGSY entered the garage of the residence.



23. SAVANGSY opened a rifle case that had an AR-style pistol and allowed the ATF UC to inspect the firearm. SAVANGSY told the ATF UC the firearms would cost "2" (short for \$2,000). The ATF UC then counted and paid SAVANGSY \$2,000.00 in pre-recorded funds.

24. The ATF UC retrieved a backpack from the UC vehicle to pack the firearms and the magazine. For this transaction, the UC purchased the following:

- a. One (1) Anderson Manufacturing AM-15 (SN: 17034491), 300 caliber, semi-automatic pistol
- b. Three (3) large capacity AR type magazines



October 12, 2018 - UC Purchase from SAVANGSY

25. At approximately 10:09 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC observed SAVANGSY exit the previously identified white Honda Accord. The ATF UC observed SAVANGSY carrying a black box out of the vehicle and to the entrance of the garage.

26. Upon entering the garage, SAVANGSY opened the lid to the box of the black box to show the ATF UC the Glock pistol that was concealed inside. The ATF UC saw the auto sear was already attached to the Glock pistol. (An "auto sear" is a firearm part that allows a gun to fire in a fully-automatic mode, i.e. firing more than one round of ammunition with a single trigger pull.) The ATF UC counted and paid SAVANGSY \$1,700.00 in pre-recorded funds for the pistol.

27. SAVANGSY told the ATF UC he would have more firearms available after the weekend. For this transaction, the UC purchased the following:

- a. One (1) Glock 26 (SN: PBC479), 9 mm caliber, semi-automatic pistol, with
- b. One (1) Glock selector switch style auto sear (SN: None)
- c. Nine (9) rounds of 9 mm ammunition
- d. Three (3) Glock type magazines
- e. One (1) Glock box



October 18, 2018 - UC Purchase from SAVANGSY

28. At approximately 4:58 PM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence and rang the doorbell. The ATF UC observed SAVANGSY come from inside the residence and greet the UC. The ATF UC then observed SAVANGSY use his keys to unlock the side door of the garage.



29. Both SAVANGSY and the ATF UC entered into the garage where the two pistols were kept. SAVANGSY told the ATF UC the individual who was the source of the auto sears was recently arrested. However, the source of the firearms had some additional auto sears that the source was able to install on the two pistols. The ATF UC then counted and paid SAVANGSY \$3,800 for the two Glock pistols. For this transaction, the UC purchased the following:

- a. Glock 22, 40 caliber, semi-automatic pistol (SN: GPN518), with
- b. Glock selector switch style auto sear (SN: None)
- c. One (1) Glock style 40 caliber magazine
- d. Glock 17, 9 mm caliber, semi-automatic pistol (SN: BFED627), with
- e. Glock selector switch style auto sear (SN: None)
- f. One (1) Glock style 9 mm caliber large capacity magazine



October 23, 2018 - UC Purchase from SAVANGSY

30. At approximately 10:49 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle and approached the front door of the residence. The ATF UC observed SAVANGSY come from inside the residence and greet the UC. The ATF UC then observed SAVANGSY use his keys to unlock the side door of the garage.



31. After entering the garage, the ATF UC observed SAVANGSY walk towards a shelf, covered by a sheet, and removed the Glock pistol to give to the UC. SAVANGSY asked the ATF UC "...want the bullets too..." and the ATF UC replied in the affirmative. The ATF UC asked SAVANGSY why the other firearms had not arrived and SAVANGSY told the UC the source of the firearms was "lagging." SAVANGSY then clarified that it was his brother-in-law's source of firearms. The ATF UC then counted and paid SAVANGSY \$1,900.00 in pre-recorded funds for the pistol. For this transaction, the UC purchased the following:

- a. Unserialized Glock type (SN: None), 40 caliber, semi-automatic pistol
- b. Glock selector switch style auto sear (SN: None)
- c. One (1) high capacity Glock type magazine
- d. Thirty (30) 40 caliber ammunition
- e. Two (2) Glock type magazines



October 26, 2018 - UC Purchase from SAVANGSY

32. At approximately 3:28 PM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. SAVANGSY had opened the front door of the residence and the screen door for the ATF UC to enter. The ATF UC greeted SAVANGSY through the doorway and SAVANGSY motioned to enter the residence. The ATF UC entered the residence and met SAVANGSY in the kitchen area.

33. The ATF UC observed the rifle and pistol on the counter of the kitchen area and gave the UC the rifle to inspect. SAVANGSY told the ATF UC the source of the firearms would be traveling to Las Vegas to purchase more Glock pistols. SAVANGSY told ATF UC he would have more Glocks available for the next transaction. The ATF UC counted and paid SAVANGSY \$4,200.00 in pre-recorded funds for the rifle and the Glock pistol.

34. On October 26, 2018, an ATF agent measured the rifle to have a barrel length of 8.75 inches and an overall length of 24 inches.



35. For this transaction, the UC purchased the following:
- a. Del-Ton DTI-15 (SN: DTI-S167156), 5.56 caliber, semi-automatic rifle
 - b. One (1) large capacity magazine
 - c. One (1) large capacity PMag magazine
 - d. Glock 19 (SN: BFER770), 9 mm caliber, semi-automatic pistol, with
 - e. Glock selector switch style auto sear (SN: None)
 - f. One (1) large capacity 17 round Glock type magazine
 - g. Thirty (30) rounds of 9 mm caliber ammunition
 - h. One (1) large capacity 15 round Glock type magazine



November 5, 2018 - UC Purchase from SAVANGSY

36. At approximately 1:42 PM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle and approached the front door of the residence. SAVANGSY had opened the front door of the residence and the screen door for the UC to enter. The ATF UC greeted SAVANGSY through the doorway and SAVANGSY motioned to enter the residence. The ATF UC entered the residence, observed SAVANGSY return to the back bedroom area of the residence, returned with the two firearms, and guided me to the kitchen area.

37. The ATF UC asked SAVANGSY if the AR type pistol was really a fully automatic pistol. SAVANGSY responded in the affirmative. The ATF UC then opened the AR type pistol and saw the lightening link inserted in the trigger well of the lower receiver. (A "lightening link" is a metal part that allows a firearm to fire fully automatic.) SAVANGSY responded with "you been dealing with that for hella long..." because of the UC's knowledge to check. The ATF UC then counted and paid SAVANGSY \$4,400 for the firearms.

38. SAVANGSY indicated he may be traveling to Reno, NV to purchase more firearms. SAVANGSY then continued to tell the ATF UC "these will be held for you anyways, it don't matter...I don't want to sell to nobody else...all your shit goes to Canada".

39. On November 5, 2018, ATF agent inspected the AR type pistol and observed a lightening link was inserted into the trigger well, to convert the pistol from shooting semi-automatic to fully automatic.



40. For this transaction, the UC purchased the following:
- a. Glock 17 (SN: ZEU452), 9 mm caliber, semi-automatic pistol, with
 - b. One (1) Glock selector switch style auto sear (SN: None)
 - c. One (1) large capacity Glock type magazine
 - d. Twenty five (25) 9 mm caliber ammunition
 - e. Unserialized unmarked (SN: None), 5.56 caliber, fully-automatic pistol
 - f. One (1) large capacity AR-15 type magazine



November 7, 2018 - UC Purchase from SAVANGSY

41. At approximately 1:31 PM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. SAVANGSY had opened the front door of the residence and the screen door for the ATF UC to enter. The ATF UC greeted SAVANGSY through the doorway and SAVANGSY motioned to enter the residence. The ATF UC entered the residence, observed SAVANGSY return to the back bedroom area of the residence, and returned with the three firearms.

42. The ATF UC inspected firearms and the AR pistol to ensure they were all fully automatic. The ATF UC told SAVANGSY the previously purchased firearms had issues because the lightening link was bent. SAVANGSY told the ATF UC he would make sure the future ones would be manufactured better. SAVANGSY showed the ATF UC a picture of a short barreled rifle and asked if the ATF UC would be interested in purchasing it. The ATF UC answered in the affirmative. The ATF UC paid SAVANGSY \$6,900.00 in pre-recorded funds for the firearms.

43. On November 7, 2018, ATF agent inspected the AR type pistol and observed a lightening link was inserted into the trigger well, to convert the pistol from shooting semi-automatic to fully automatic.



44. For this transaction, the UC purchased the following:
- a. Glock 23 (SN: UTV095), .40 caliber, semi-automatic pistol, with
 - b. One (1) Glock selector switch style auto sear (SN: None)
 - c. One (1) large capacity Glock type magazine
 - d. Twelve (12) .40 caliber ammunition
 - e. Unserialized unmarked (SN: None), 5.56 caliber, fully-automatic pistol
 - f. One (1) large capacity AR-15 type magazine
 - g. Unserialized unmarked (SN: None), 5.56 caliber, fully-automatic pistol
 - h. One (1) large capacity AR-15 type magazine



November 13, 2018 - UC Purchase from SAVANGSY

45. At approximately 10:30 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. SAVANGSY opened the front door of the residence and the screen door for the ATF UC to enter. Both the ATF UC and SAVANGSY entered the kitchen where SAVANGSY had the pistols on the counter. The ATF UC then counted and paid SAVANGSY \$3,800.00 in pre-recorded funds for the firearms. SAVANGSY asked if he was able to get an AR pistol if the UC would be able to come pick it up. The ATF UC answered SAVANGSY in the affirmative.

46. Later on the same date, at approximately 1:06 PM, the ATF UC returned to SAVANGSY's residence. The ATF UC exited the UC vehicle, approached the front door of the residence. The ATF UC approached the front door and shortly thereafter SAVANGSY came to open the security screen door. Upon entering the kitchen, SAVANGSY had the AR pistol to show the ATF UC. The ATF UC agreed that it was the same AR pistol in the picture SAVANGSY had sent via text message to the ATF UC. While the ATF UC was inspecting the AR pistol, SAVANGSY showed the UC the 1911 pistol in the top kitchen counter drawer that had a flash suppressor on the barrel. SAVANGSY was showing the ATF UC it had the same function as the flash suppressor on the AR pistol.

47. The ATF UC inspected the Glock pistol SAVANGSY was selling then counted and paid SAVANGSY \$4,200.00 in pre-recorded funds for the firearms. SAVANGSY told the ATF UC he would have more firearms when the UC returned back to Sacramento.

48. For this transaction, the UC purchased the following:

- a. Glock 17 Gen 4 (SN: BERP060), 9 mm caliber, semi-automatic pistol, with
- b. One (1) Glock selector switch style auto sear (SN: None)
- c. One (1) large capacity Glock type magazine
- d. Glock 17 Gen 4 (SN: WFL300), 9 mm caliber, semi-automatic pistol, with
- e. One (1) Glock selector switch style auto sear (SN: None)
- f. One (1) large capacity Glock type magazine
- g. Spike's Tactical ST15 (SN: 12479), fully automatic AR type pistol
- h. One (1) large capacity AR-15 type magazine
- i. Glock 17 Gen 4 (SN: BEPV625), 9 mm caliber, semi-automatic pistol, with
- j. One (1) Glock selector switch style auto sear (SN: None)
- k. One (1) large capacity Glock type magazine



December 7, 2018 - UC Purchase from SAVANGSY

49. At approximately 11:00 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. SAVANGY opened the screen door for the UC to enter. The ATF UC greeted SAVANGY through the doorway and met SAVANGSY in the kitchen inside the residence. The ATF UC observed SAVANGSY reaching behind a shelf where the AR pistol was hidden.



50. SAVANGSY gave the ATF UC the AR pistol to inspect. The ATF UC opened the AR pistol and observed the lightening link that was placed in the trigger well of the receiver. SAVANGSY then retrieved the Glock type pistol next and gave them to the UC.



51. SAVANGSY told the ATF UC one of the main sources of the firearms was arrested traveling back from Texas. SAVANGSY then told the ATF UC the source's cousin was still getting firearms locally, Modesto, and other areas close to Sacramento. SAVANGSY also told the ATF UC the cousin was attempting to make contact with the individual selling the firearms that is located in Texas. The ATF UC counted and paid SAVANGSY \$6,000.00 for the firearms in pre-recorded funds.

52. For this transaction, the UC purchased the following:

- a. Unserialized AR-15, .223 caliber, fully automatic AR type pistol (SN: None)
- b. One (1) large capacity AR-15 type magazine
- c. Polymer80 Glock-style, 9 mm caliber, semi-automatic pistol (SN: None)
- d. One (1) Glock selector switch style auto sear (SN: None)
- e. One (1) large capacity Glock type magazine
- f. Polymer80 Glock-style, .40 caliber, semi-automatic pistol (SN: None)
- g. One (1) Glock selector switch style auto sear (SN: None)

- h. One (1) large capacity Glock type magazine



January 3, 2019 - UC Purchase from SAVANGSY

53. At approximately 9:49 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. SAVANGSY opened the screen door for the UC to enter. The ATF UC observed SAVANGSY removed the AR type pistols from the living room area and brought them into the kitchen of the residence. The ATF UC then counted and paid SAVANGSY \$6,300.00 for the firearms. SAVANGSY confirmed the amount of funds.



54. For this transaction, the UC purchased the following:
- a. Unserialized AR-15 (SN: None), .223 caliber, fully automatic AR type pistol
 - b. One (1) large capacity AR-15 type magazine
 - c. Sixteen (16) rounds of .223 caliber ammunition
 - d. Unserialized AR-15 (SN: None), .223 caliber, fully automatic AR type pistol
 - e. One (1) large capacity AR-15 type magazine

- f. Polymer80 Glock-style (SN: None), 9 mm caliber, semi-automatic pistol with,
- g. One (1) Glock selector switch style auto sear



January 14, 2019 - UC Purchase from SAVANGSY

55. At approximately 10:29 AM, the ATF UC arrived to SAVANGSY's residence as previously arranged. The ATF UC exited the UC vehicle, approached the front door of the residence. The ATF UC knocked on the front door and waited for SAVANGSY to open front door. The ATF UC greeted SAVANGSY through the doorway and entered the residence. The ATF UC observed SAVANGSY go to the bedroom area of the residence and returned with the two AR type pistols in his hand.

56. SAVANGSY placed the two AR type pistols on the kitchen table. The ATF UC quickly inspected the firearms and placed them in the case. The ATF UC observed SAVANGSY looking around different areas in the house for the Glock pistol that was hidden.



57. At approximately 10:42 AM, SAVANGSY attempted to call an unknown individual to ask where the Glock pistol was hidden. SAVANGSY then told the ATF UC there were two more AR type pistols and three Glock pistols available for purchase, if the ATF UC wanted to return later today or tomorrow.

58. The ATF UC counted and paid SAVANGSY \$4,400.00 in pre-recorded funds for the firearms and \$800.00 for the suspected Xanax pills. SAVANGSY recounted and confirmed the amount given.



59. For this transaction, the UC purchased the following:
- a. Unserialized AR-15 (SN: None), .223 caliber, fully automatic AR type pistol
 - b. One (1) large capacity AR-15 type magazine
 - c. Unserialized AR-15 (SN: None), .223 caliber, fully automatic AR type pistol
 - d. One (1) large capacity AR-15 type magazine
 - e. Approximately 45.59 grams of suspected Xanax pills



Identifying Lindley Drive Residence

60. On January 16, 2019, I queried a law-enforcement database that listed Kevin SAVANGSY's residence as 358 Lindley Drive in Sacramento, California, further described in Attachment A.

Federal Firearms License and National Firearms Registry Check

61. On January 16, 2019, I checked the Federal Licensing System database and confirmed that Kevin SAVANGSY does not have a federal firearms license to sell and/or manufacture firearms.

62. On January 16, 2019, I caused the National Firearms Registration and Transfer Records to be queried, with the results of that query returning negative for Kevin SAVANGSY. Accordingly, SAVANGSY cannot legally possess or transfer fully-automatic firearms.

Execution of Federal Search Warrant on January 24, 2019

63. On January 24, 2019, law enforcement agent executed a federal search warrant at SAVANGSY's residence at 358 Lindley Drive. During the course of executing the search warrant, law enforcement officers seized SAVANGSY and:

- a. 8 machineguns
- b. 6 semi-automatic firearms
- c. 3.2 pound of marijuana
- d. \$38,000 in cash

Conclusion

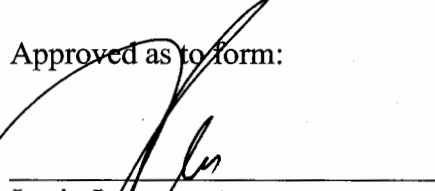
64. Based on the foregoing facts set forth in this Affidavit, I believe there is probable cause that SAVANGSY has violated 18 U.S.C. § 922(a)(1)(A) and 26 U.S.C. § 5861(d).


Daniel Yun
ATF Special Agent

Sworn and Subscribed to me on January 24, 2019,


Hon. EDMUND F. BRENNAN
United States Magistrate Judge

Approved as to form:


Justin Lee
Assistant United States Attorney

PENALTY SLIP

United States v. Kevin Savangsy

COUNT ONE:

18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing and
Manufacturing in Firearms

Fine of up to \$250,000, and/or
Imprisonment of up to 5 years, or both
Term of Supervised Release of up to 3 years

COUNT TWO:

26 U.S.C. § 5861(d) – Unlawful Possession of an Unregistered
Firearm

Fine of up to \$10,000, and/or
Imprisonment of up to 10 years, or both
Term of Supervised Release of up to 3 years

COURT ASSESSMENT: \$100 each count